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Application No. 10/711,476
Technology Center 2878
Amendment dated June 28, 2007
Reply to Office Action dated March 28, 2007

JUN 28 2007

REMARKS

As of the filing of the present Office Action, claims 1-24 were pending in the above-identified US Patent Application. In the Office Action, the Examiner rejected all of the claims for a second time under 35 USC §103. Favorable reconsideration and allowance of claims 1-24 are respectfully requested in view of the following remarks.

Independent claims 1-24 were rejected as unpatentable over U.S. Patent No. 6,828,543 to Chen in view of U.S. Patent No. 6,518,656 to Nakayama et al. (Nakayama) alone or in further view of one or more of the following additional references: U.S. Patent Application Publication No. 2002/0057468 to Segawa et al. (Segawa), U.S. Patent No. 6,395,124 to Oxman et al. (Oxman), U.S. Patent Application Publication No. 2003/0214024 to Ono, and U.S. Patent No. 6,765,236 to Sakurai. Applicants respectfully request reconsideration of these rejections for the following reasons.

Chen was cited for disclosing all limitations of independent claim 1 except Applicants' light-preventing means (for which Nakayama is applied). In the "Response to Arguments" section of the Office Action, the Examiner cited the combination of Chen's "interconnection circuit" 21 and flexible printed

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circuit (FPC) 50 is equivalent to Applicants' "second substrate" 122. Applicants respectfully disagree. Chen's "interconnection circuit" 21 is merely individual conductors (see Figures 3 and 4), and therefore do not define the "opening" 136 required of Applicants' second substrate 122, and Chen's FPC 50 is on only one side of the first substrate 20 (see Figure 7 and compare to Figures 3 and 4, which show the locations of the solder points 211 to which the FPC 50 is bonded) and therefore also does not define the "opening" 136 required by Applicants' second substrate 122. Therefore, together Chen's "interconnection circuit" 21 and FPC 50 are not equivalent to Applicants' second substrate 122 and its opening 136.

Furthermore, Chen's mask 24 cannot "coincid[e] with an edge of [an] opening" associated with the "second substrate" because, as shown above, Chen's combined "interconnection circuit" 21 and FPC 50 don't define an opening. Furthermore, Figure 7 clearly shows that Chen's mask 24 does not "coincide" with any edge of either the interconnection circuit 21 or FPC 50. To the contrary, the mask 24 extends far beyond the innermost extent of the FPC 50 and falls far short of the innermost extent of the circuit 21. Finally, Chen's mask 24 terminates at the "jelly-like" material 12 (not numbered in Figure 7; see Figure 1), which is not disclosed as opaque. Therefore, Chen's mask 24

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allows light to enter the housing 40 by allowing light to pass through the "jelly-like" material 12 and then through the "second substrate" 21/50 contacting the "jelly-like" material 12.

The above arguments apply equally to independent claim 14, which recites the limitations discussed above.

Finally, regarding claim 9 (which depends from claim 1) and independent claim 14, the Examiner stated that "Chen discloses (fig. 7) a means (40,4) for preventing light from entering the module through the first substrate [20], wherein the means . . . comprises a portion of the housing [40,4] surrounding the first substrate [20]." However, Chen requires a channel 411 (unnumbered in Figure 7; see Figure 9) that indisputably allows light to freely enter Chen's module through the substrate 20.

The ability for light to penetrate Chen's module as described above is illustrated with arrows in the reproduction of Chen's Figure 7, attached hereto as "Exhibit A."

In view of the above, to arrive at Applicants' invention one skilled in the art would be required to modify the teachings of Chen. However, none of Nakayama, Segawa, Oxman, Ono, or Sakurai were cited or applied as supplementing the teachings of Chen in a manner that would result in Chen

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having the features of Applicants' invention discussed above. Therefore, Applicants respectfully request withdrawal of the rejections under 35 USC §103(a).

Closing

In view of the above, Applicants respectfully request that their patent application be given favorable reconsideration.

Should the Examiner have any questions with respect to any matter now of record, Applicants' representative may be reached at (219) 462-4999.

Respectfully submitted,



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Attachment: Exhibit A (Figure 7 of U.S. Patent No. 6,828,543 to Chen)